



State of Ohio Environmental Protection Agency

Southeast District Office

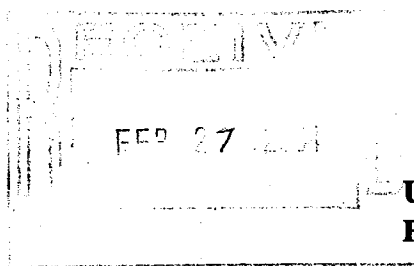
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0490040107

February 25, 2004



U.S. DOE-PORTS  
PIKE COUNTY

DERR CORRESPONDENCE

Mr. William E. Murphie  
Department of Energy  
Portsmouth/Paducah Project Office  
1017 Majestic Place - Suite 200  
Lexington, KY 40513

RE: X-701B Holding Pond and Retention Basins Corrective Measures Implementation (CMI) Program Plan

Dear Mr. Murphie:

Enclosed are Ohio EPA comments on the CMI for the X-701B Holding Pond. Please revise the document in accordance with the requirements of Article XI of the Ohio Consent Decree. Ohio EPA is willing to discuss the comments at any time should U.S. DOE be willing to do so prior to submitting a written response.

If you have any questions, please do not hesitate to contact me at (740) 380-5289.

Sincerely,

Maria Galanti  
Site Coordinator  
Division of Emergency and Remedial Response

MG/jg

cc: Russel Vranicar, U.S. DOE-PORTS  
Gilbert Drexel, BJC-PORTS  
Gene Jablonowski, U.S. EPA-Region V

please comment  
on item #6.  
I would like a response  
no later than 3/12/04

Thanks!

Kraig Smith x2616  
PORTS



### **X-701B Holding Pond CMI Comments**

- 1) Page 3, Section 3 Cleanup Agreements and Regulatory Compliance: U.S. DOE should modify this section of the report to discuss the Director's Final Findings and Orders for Integration as well as noting that the remedies for this unit must meet the substantive requirements of RCRA. Although the report does discuss the Directors Final Findings and Orders for Integration (Integration Order) on the next page and the requirement to meet the substantive requirements of RCRA on Page 11, it may make more sense to include a brief discussion of the orders and requirements to meet the substantive requirements of RCRA in this section of the report. The Integration Order is a regulatory requirement which must be met and US DOE must meet the substantive requirements of RCRA in order for the remedy to be deemed acceptable to Ohio EPA.
- 2) Page 3, Section 4: U.S. DOE should note that the X-701B is considered to be a unit regulated per the requirements of RCRA in this section of the CMI. The history of the unit should note why this unit is regulated per the requirements of "RCRA."
- 3) Page 4: Please insert the word "RCRA" between the words two-phase and closure in the first sentence of the second paragraph. This clarification will describe the type of closure the unit was undergoing in 1989.
- 4) Page 12, Section 6.2: Please remove the word "limited" for the second bulleted item. It has yet to be determined how much oxidant may be required to effectively remediate the groundwater plume east of the horizontal wells. The decision document notes that the purpose for this injection is to "remediate the portion of the plume which extends eastward from this well (near the security fence) to the interceptor trench." The amount of oxidant to be placed in this well may vary over time and should not be considered limited. Further discussion about the amounts of oxidant can be discussed during the design and implementation of the remedy.
- 5) Page 16: See above comment in No. 4 regarding "limited quantity of oxidant" to be injected in the eastern horizontal well. Enough oxidant should be injected to significantly impact the portion of the plume that extends beyond the horizontal well east to the collection trench. The collection trench is anticipated to be operated until such time as the contamination emanating from the plume would not impact Little Beaver Creek and the remedial goals outlined in the Decision Document for X-701B are met. The sooner the contamination is addressed in the area of the plume, the sooner the collection trench operation can be halted potentially saving U.S. DOE significant remedial dollars.

- 6) Page 16: U.S. DOE should include a statement noting that "equitable servitude" will be required along with deed and land use restriction for this area. Equitable servitude will be required in order for U.S. DOE to demonstrate the enforceability of long term deed restrictions.
- 7) The Schedule: The schedule indicates that 50% design for the caps will not be submitted until the second quarter of 2009. In order to help accelerate the review process, it may be prudent to submit a 10-30% design package showing the foot print of the caps and any groundwater monitoring wells or other utilities which may be impacted by the cap installation. Please forward a pre-design package in the 4<sup>th</sup> quarter of 2007.
- 8) The Schedule: Please note what the red diamonds indicate in the schedule. We assume they mean critical dates for a particular submittal.